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Attorneys for Defendant Bank of America, National Association, as Successor in Interest to  
Countrywide Bank, FSB

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
MEDFORD DIVISION

**JOHN WOODWORTH and GILDA  
HODGES,**

Case No. 09-CV-3058-CL

Plaintiffs,

v.

**BANK OF AMERICA, NATIONAL  
ASSOCIATION**, as successor in interest to  
**COUNTRYWIDE BANK, FSB;**  
**RECONTRUST COMPANY, NATIONAL  
ASSOCIATION**, and **FEDERAL HOME  
LOAN MORTGAGE CORPORATION, aka  
FREDDIE MAC,**

Defendants.

**DECLARATION OF MEGAN E. SMITH  
IN SUPPORT OF DEFENDANT BANK  
OF AMERICA'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO FILE  
REPLY TO MOTION TO DISMISS**

I, Megan E. Smith, declare as follows:

1. I am an attorney at Lane Powell PC, one of the attorneys of record for defendant Bank of America, National Association, as successor in interest to Countrywide Bank, FSB ("B of A"). I am competent to testify and make this declaration based on my personal

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B OF A'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY  
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knowledge. If called as a witness, I could and would testify to the facts stated herein. I make this declaration in support of B of A's Unopposed Motion for Extension of Time to File Reply to Motion to Dismiss.

2. In the last month or so, the attorneys of record for B of A, Pilar French and myself, have been inundated with new lawsuits, including several filed by *pro se* plaintiffs who are unwilling to compromise with us on response deadlines. In addition, in the last three weeks, we have been required to spend a considerable amount of time responding to and defending against multiple requests for preliminary injunctions. We have been working diligently to respond to the complaints and the requests for preliminary injunction, but need additional time to file the reply brief in this matter.

3. Oral argument on B of A's Motion to Dismiss has not yet been set. Accordingly, this request is not filed for the purpose of delay and no party will be prejudiced by the granting of this Motion. Plaintiffs do not oppose this Motion.

**Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.**

DATED: August 26, 2010

s/Megan E. Smith  
Megan E. Smith

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B OF A'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY  
TO MOTION TO DISMISS